

## REMARKS

Applicants respectfully request reconsideration of this application as amended. Claims 1, 4, 6, 8, 10, 14, 35, 38 and 45-49 have been amended. Claims 2-3, 5, 7, 9, 11-13, 15-34, 36-37 and 39-44 have been cancelled without prejudice. No new claims have been added. Therefore, claims 1, 4, 6, 8, 10, 14, 35, 38 and 45-49 are presented for examination.

### 35 U.S.C. § 103 Rejection

Claims 1, 4, 6, 8, 10, 14, 35, 38 and 45-49 stand rejected under 35 U.S.C. § 103(a), as being unpatentable over Kuansan, et al., EP 1 255 194 (“*Kuansan*”) in view of Gottfurcht, et al., U.S. Patent No. 7,020,845 (“*Gottfurcht*”) and further in view of Polcyn, et al., U.S. Patent No. 6,865,258 (“*Polcyn*”).

Applicants respectfully disagree with the Examiner’s characterization of the cited references and the pending claims. Nevertheless, Applicants propose additional amendments to the pending claims and provide the following remarks.

Claim 1, as amended, recites:

A method comprising:

receiving at a server computer system a client request from a client computer device via a network;

interpreting the client request including identifying a selection of at least one of a plurality of web interaction modes, each of the plurality of web interaction modes to perform interpretation of content being transmitted between the server computer system and the client computer device; and

identifying a web interaction mode selected by the client computer device, and performing speech processing based on the selected web interaction mode, wherein performing speech processing includes determining an active display element that is to be focused and identifying the active display element with its associated identifier,

retrieving a synchronization relationship between one or more speech elements and the active display element to compose grammar of the one or more speech elements, and

dynamically correcting the composed grammar of the one or more speech elements using a real-time speech recognition based on the synchronization relationship.  
(emphasis added)

The Examiner acknowledges the deficiencies of *Kuansan* and *Gottfurcht*, but relies on *Polcyn* to allegedly make up for such deficiencies of the two references. Applicants respectfully disagree. In particular, *Polcyn* discloses “the transcription interface may monitor the transcriber’s activity and automatically adjust the presentation of data to be transcribed according to such activity” (col. 12, lines 18-21). *Polcyn* further discloses “the transcription application may determine the position of the cursor . . . [and] then identify the appropriate message segment corresponding to the transcriber’s focus” (col. 17, lines 21-25).

In contrast, claim 1, as amended, recites “retrieving a synchronization relationship between one or more speech elements and the active display element to compose grammar of the one or more speech elements, and dynamically correcting the composed grammar of the one or more speech elements using a real-time speech recognition based on the synchronization relationship” (emphasis added). *Polcyn*’s monitoring of transcriber’s activity and the adjustment of the presentation data according to such activity is loosely based on the activities like the position of the cursor and **does not include** retrieving a synchronization relationship various elements to compose grammar of the one or more speech elements and dynamically correcting the composed grammar of the speech elements using a real-time speech recognition based on the synchronization relationship as recited by claim 1. There mere identifying of the “*appropriate message segment corresponding to the transcriber’s focus*” of *Polcyn* is **irrelevant** to the synchronization relationship and use of that synchronization relationship as recited by claim 1. Hence, *Polcyn* does not make up for the deficiencies of *Kuansan* and *Gottfurcht*.

Further, as argued in previous office action responses, *Kuansan* disclose “a *markup language* for execution on a client device in a client/server system includes extensions for recognition” (abstract; emphasis added). *Kuansan* further discloses “the *extensions may be interpreted in two different ‘modes’ according to the capabilities of the device* upon which the browser is being executed on . . . [for example, in] a *first mode, ‘object mode’, the full capabilities are available* (paragraph 0043; emphasis provided). *Kuansan*’s technique relates to employing a *markup language for execution* on a client device and the *different modes of Kuansan are based on the capabilities of the client device*. For example, *Kuansan* further discloses “[t]he extensions can also be supported in a ‘declarative mode’ . . . [such as] a browser operating in a declarative mode is called a ‘downlevel browser’ and does not support full eventing and scripting capabilities” (paragraph 0044; emphasis added).

*Gottfurcht* discloses a web page having a link to a sister site to facilitate simplified navigation. Pages from the sister site are served responsive to actuation of the sister site link (*see* abstract). *Gottfurcht*’s focusing merely refers to focusing on a “*region that is enlarged relative to the regions which are not in focus . . . for web browsing in a television context* where distance from the set may make reading the unscaled page difficult for impossible” (col. 5, lines 31-36). *Gottfurcht*’s focusing is completely irrelevant to “identifying a web interaction mode selected by the client computer device, and performing speech processing based on the selected web interaction mode, wherein performing speech processing includes determining an active display element that is to be focused and identifying the active display element with its associated identifier” as recited by claim 1. Further, *Gottfurcht* and *Kuansan*, neither individually nor when combined, teach or reasonably suggest synchronization relationship as recited by claim 1.

Accordingly, for the reasons set forth above, Applicants respectfully request the

withdrawal of the rejection of claim 1 and its dependent claims.

Claims 35 and 45 contain limitations similar to those of claim 1. Accordingly, for at least the same reasons as set forth above with respect of claim 1, Applicants respectfully request the withdrawal of the rejection claims 35 and 45 and their dependent claims.

### **Conclusion**

In light of the foregoing, reconsideration and allowance of the claims is hereby earnestly requested.

### **Invitation for a Telephone Interview**

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

### **Request for an Extension of Time**

Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

### **Charge our Deposit Account**

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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